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Attorneys for Defendant CALIFORNIA SECURITY ALARMS, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

YVONNE COX,)	NO. C04-02530 SI
)	
Plaintiff,)	STIPULATION TO RELEASE
)	PLAINTIFF'S MEDICAL RECORDS;
vs.)	[PROPOSED] ORDER
)	
CALIFORNIA SECURITY ALARMS, INC.,)	
)	
Defendants.)	
_____)	

The parties to the above-entitled action jointly submit this Stipulation to Release Medical Records of Plaintiff YVONNE COX in this matter.

Plaintiff YVONNE COX was treated by Sarah Ashbrook, Community Counseling Center, California State University, East Bay (formerly, California State University, Hayward) located at 22580 Carlos Bee Boulevard, Hayward, California 94542-3076, Telephone: (510) 885-3007.

RECORDS TO BE RELEASED

1. Any and all Intake Report(s), Progress Notes; Discharge Summary; Verification of Counseling Services; Diagnosis, Modulations, Result of Clinical Testing and Diagnostic Summary, as well as any records which speak to the frequency of treatment furnished.

Said records shall be released to Plaintiff YVONNE COX's legal counsel, Beth W. Mora, Esq. at the Law Offices of Lucius A. Cooper, 18 Crow Canyon Court, Suite 145, San Ramon, California, 94583 within fifteen (15) days of the date the Stipulation and Order is executed by the Court. Plaintiff's counsel shall have fifteen (15) days thereafter to provide Defendant CALIFORNIA SECURITY ALARMS, INC.'s counsel of record in this matter with a full and complete copy of the records produced.

SIGNATURE OF COUNSEL

DATED: June 6, 2005

By: /s/
BETH W. MORA, ESQ.
LAW OFFICES OF LUCIUS A. COOPER
Attorneys for Plaintiff

DATED: June 6, 2005

By: /s/
H. ANN LIROFF, ESQ.
HANNIG LAW FIRM
Attorneys for Defendant
CALIFORNIA SECURITY ALARMS, INC.

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED: _____

ICT JUDGE

